

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

FILED

2016 MAY 16 P 2:30

SEAL,

Plaintiff,

v.

SEAL,

Defendant.

Civil Action No.

FILED EX PARTE AND UNDER SEAL
PURSUANT TO 31 U.S.C. §§ 3729-3733

FILED

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

2025 MAY 15 P 2:30

UNITED STATES OF AMERICA *ex rel.*)
INGRID DE LA FUENTE,)
)
Plaintiff,)
)
v.)
)
MADISON SPRINGFIELD, INC. *et al.*)
)
Defendants.)
_____)

No. 1:23-cv-1693-LMB-LRV
FILED UNDER SEAL AND
AND EX PARTE PURSUANT TO
31 U.S.C. § 3730(b)

JOINT NOTICE OF VOLUNTARY DISMISSAL AND
MOTION TO UNSEAL

Pursuant to Rule 41(a)(1)(i) of the Federal Rules of Civil Procedure, Relator Ingrid de la Fuente voluntarily dismisses the Complaint in the above-captioned action against all Defendants, without prejudice to the United States and without prejudice as to the Relator.

Pursuant to 31 U.S.C. § 3730(b)(1), the United States consents to the dismissal of the Complaint in the above-captioned action without prejudice as to the United States.

The United States submits that the sealing requirement of 31 U.S.C. § 3730(b)(2) is no longer needed and requests that the Relator's Complaint, this Notice and Motion, and the attached proposed Order be unsealed. The United States respectfully requests that all other filings in this action remain under seal because, in discussing the content and extent of the Government's investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

A proposed Order is submitted with this Notice and Motion.

DATED this 16th day of May, 2025

WE ASK FOR THIS:

Janel Quinn (by Tanya Kapoor, AUSA, with permission)

R. Scott Oswald (Bar No. 41770)

Janel Quinn (Bar No. 89503)

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